

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
 Plaintiff,)
)
)
 vs.) No. 4:18 CR 264 RWS/PLC
)
)
ZACHARY KYLE HAMBY, et al.,)
)
)
 Defendants.)

DEFENDANT'S SUMMARY OF EXPERT EVIDENCE TO BE PRESENTED

COMES NOW, Defendant, Zachary Kyle Hamby, through his attorneys, The Hale Law Firm, by Larry D. Hale, and in accordance with Rule 16(b)(1)(C), Federal Rules of Criminal Procedure, provides a written summary of the expert evidence that will be produced by Defendant during the July 10, 2019 competency hearing in the above-styled matter:

1. The Defendant intends to present the expert credentials and opinions of Dr. C. Robert Cloninger, MD, PHD, at the above-mentioned competency hearing. Dr. Cloninger is a Wallace Renard Professor of Psychiatry and Psychology at Washington University School of Medicine and Director of the Sansone Center for Well-Being, St. Louis, Misouri. The Curriculum Vitae of Dr. Cloninger will be presented at the hearing and has been provide to the Government, as well as his detailed report of expert opinions and findings, notes, and test results.

2. Dr. Cloninger will provide expert opinions as are detailed in his October 29, 2018 report, including (but not limited too) the facts that Defendant does not understand the charges against him and is not able to assist his attorney in preparing his defense; that

Defendant is permanently disabled by mild mental retardation, a personality disorder, and a pervasive developments disorder of the Autism Spectrum; that Defendant is incompetent to stand trial and that Dr. Cloninger is unaware of any treatment that is likely to restore Defendant to competency in the foreseeable future. Additionally, as set forth in his October 29, 2018 report, Defendant will offer Dr. Cloninger's detailed review of Defendant educational and medical history, and his interview and testing of Defendant. All of the reasons for the foregoing opinions and conclusions are set forth in Dr. Cloninger's report and all opinions are to a reasonable degree of professional certainty.

Respectfully Submitted,
THE HALE LAW FIRM

/S/ Larry D. Hale

Larry D. Hale, #26997MO
Counsel for Defendant, Hamby
1221 Locust, Suite 310
St. Louis, MO 63103
(314)231-3168
(314)231-4072 (Fax)

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was electronically delivered to all counsel of record on this 1st day of July, 2019, through the Court's electronic filing system.

/S/ Larry D. Hale

Larry D. Hale